UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA	)	
	)	
VS.	)	1:06-cr-0016-S
	)	
HOHAN LOPEZ	)	

MOTION TO CONTINUE EMPANELMENT

Now comes the accused, Hohan Lopez, by and through counsel, moves this Honorable Court to continue the jury empanelment in this matter, currently scheduled for May 2, 2006, until the Court's June empanelment date. In addition, the accused moves this Court for the exclusion of a total period of 30 days under the Speedy Trial Act 18 USC § 3161(h)(8).

In support of this motion, the defendant has indicated to counsel that he is requesting the additional time to continue ongoing plea negotiations with the government. Counsel for the Government, Zechariah Chafee, Assistant United States Attorney, has indictated that the Government has no objection to the granting of this motion.

Respectfully submitted
Hohan Lopez
By his attorney,

Kevin J. Fitzgerald
Assistant Federal Defender
10 Weybosset St., Ste. 300
Providence, RI 02903
(401) 528-4281

CERTIFICATION

I hereby certify that I caused a copy of this Motion to be delivered to Zechariah Chafee, Assistant United States Attorney, on April 7th, 2006.